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8 Attorneys for Plaintiff
9 UNITED STATES OF AMERICA

10
11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 GISSELLE MEDINA,

17 Defendant.
18
19

No. 2:25-mj-03507-DUTY

MOTION TO DISMISS COMPLAINT
WITHOUT PREJUDICE AGAINST
DEFENDANT PURSUANT TO FEDERAL RULE
OF CRIMINAL PROCEDURE 48(a)

20 The United States Attorney for the Central District of
21 California hereby requests leave of the Court to dismiss the
22 complaint against defendant Gisselle Medina without prejudice.

23 The government's request for dismissal is made in good faith
24 and in the interest of justice. The law "generally require[s] a
25 district court to defer to the government's decision to seek a
26 dismissal of a criminal charge" under Rule 48(a) motions when they
27 are not opposed by the defense. United States v. Gonzalez, 58 F.3d
28

1 459, 462 (9th Cir. 1995).

2 Accordingly, the government requests that the Court grant this
3 motion to dismiss the complaint without prejudice against defendant
4 Gisselle Medina pursuant to Federal Rule of Criminal Procedure
5 48(a).

6 Dated: June 27, 2025

Respectfully submitted,

7 BILAL A. ESSAYLI
United States Attorney

8 CHRISTINA T. SHAY
9 Assistant United States Attorney
Chief, Criminal Division

10
11 /s/

12 MIRELLE RAZA
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13 Attorneys for Plaintiff
14 UNITED STATES OF AMERICA
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